

Implementation of DoD Instruction 1100.13, “Surveys of DoD Personnel”

In DoDI 1100.13, the Under Secretary of Defense (Personnel & Readiness) [USD(P&R)] tasked the Defense Manpower Data Center (DMDC) with the review of survey instruments and procedures that require participation of personnel in any DoD component other than the sponsoring Component.

I. Who Is Responsible for Licensing DoD Surveys?

- A. Authority for and Scope of Responsibility.** DoD Directive 8910.1 and DoD 8910.1-M assign Washington Headquarters Services/Executive Services and Communications Directorate (WHS/ESCD) responsibility for the licensing of all information requirements that require responses from personnel in any DoD Component other than the requesting component. When such an information requirement is a survey, in accordance with DoDI 1100.13 WHS/ESCD cannot license it without DMDC’s recommendation of approval. [WHS/ESCD also coordinates the clearance of all DoD data collection forms intended for members of the public and/or other Federal agencies.]
- B. Materials Required by WHS/ESCD to License a Survey.** WHS/ESCD requires a copy of DMDC’s review to be included in documentation requesting approval and issuance of a Report Control Symbol (RCS). ESCD needs to review the survey instrument after the DMDC review to ensure that all DMDC requirements have been incorporated.

II. Materials Needed for DoDI 1100.13. The following list identifies major issues that are reviewed by DMDC in implementing DoDI 1100.13. While all of these issues need to be addressed by the submitting agency, the information does not need to comply with the ordering shown below.

- A. Statement of Purpose for the Survey Effort** (to determine if the survey instrument and procedures address the issues in the an optimum manner)
- B. Availability of Similar Information**
 - 1. Can the data from the proposed survey be obtained from record or other extant data?
 - 2. Is the survey redundant with other surveys?
 - 3. Can the information be collected by piggybacking on another planned survey (e.g., a DMDC survey or another survey by the sponsoring agency)?
- C. Sampling Plan**
 - 1. Is there a clear description of the population to which the findings are supposed to generalize?
 - 2. How will the sample be drawn?
 - a) Type of sampling design (e.g., probability vs. convenience, simple random sampling, stratified, cluster, or multi-stage)
 - b) Variables used to stratify the sampling frame (if applicable)
 - 3. What is the proposed sample size: overall and per cell?

4. What anticipated response rate was used to derive the cell sizes for the sample?
5. What criteria were used to determine who will receive a survey?

D. Analytic Considerations

1. Will data from the survey sample be weighted? If so, an explanation is needed.
2. For which subgroups (e.g., officers vs. enlisted) will the findings be reported?
3. What amount of confidence (e.g., 95%) and precision (e.g., ± 3 percentage points) does the sponsor anticipate for the findings?
4. Does the Sampling Plan clearly support the Analytic Considerations and thus the stated objectives and requirements for the survey effort?

E. Survey materials

1. Did the package submitted to DMDC include final or near final copies of survey instruments/ interview protocols, all cover letters, and instructions to potential respondents?
2. DMDC's review checks for basic survey concerns:
 - a) Flow/eye appeal
 - b) Interest
 - c) Difficulty (e.g., reading and understanding instructions, questions, and response alternatives)
 - d) Poorly constructed items (e.g., double-barreled, ambiguous, and misleading)
 - e) Standard demographic questions
3. Have directions (e.g., "Blacken the circle" or "Mark all answers that apply") been provided to tell respondents how to complete each item or set of items.
4. Does the wording for the demographic questions conform to the DoD-wide standards used in DMDC surveys?
5. Does the survey contain items from copyrighted scales? If so, has the submitting agency obtained permission to use those scales?
6. Has the survey developer consistently used highlighting. For example, are particular words or phrases all emphasized by the same method (e.g., bolding, underlining, or all caps).

F. Plans for Distributing and Collecting Survey Materials

1. Distribution of materials
 - a) How will the survey questions be delivered to potential respondents (e.g., US mail, base mail, hand delivery by a installation POC or member of the survey team, telephone questions, or access through a computer)?
 - b) Where will the survey be administered (e.g., in a dentist office, an auditorium as part of a group administration, or the respondent's home or office)?
2. Collecting completed surveys

- a) How many times will a potential respondent be contacted (e.g., a single time or a notification letter with a copy of the survey sent later)?
- b) Can the survey returns be monitored (e.g., by lithocodes on the survey) to determine who has or has not completed a survey?
- c) If a person does not return a survey, will the individual be contacted again? If so, who will be re-contacted (e.g., everyone in the sample or a subgroup tracked by numbered survey forms)?

G. Access to Surveys and Results

- 1. Who will have access to the completed surveys and the resulting electronic database(s)?
- 2. How will the hard copy of the survey (e.g., paper surveys, diskettes used in computer-administered surveys, and notes from telephone surveys) be controlled, and eventually destroyed, to protect confidentiality?
- 3. What steps will be taken to prevent identification of data related to a specific respondent or non-respondent?
- 4. What is the smallest size (n) that will be used for the presentation of results? Will the answers of a given person ever be associated with that person? For example, will John Doe's answers to a dental questionnaire be shared with the dentist in such a manner that the dentist can associate the answers with John Doe with some degree of confidence?

H. Type of Data in Electronic Dataset(s) and Access. Has the sponsoring agency defined the survey by type of data to be maintained in electronic dataset(s) and accepted all the conditions that apply? Definitions in this discussion are for the purposes of the discussion and are not the official definitions of the terms which are defined by law or regulation.

- 1. Are the survey data totally anonymous from the receipt of data?
 - a) To be considered totally anonymous no personal identifiers can remain attached to the survey once it has been received from the respondent. Further, demographic data that becomes part of the dataset cannot be so specific as to provide a possibility a respondent being identified. That is, a dataset user should not reasonably be able to simultaneously cross answers to multiple demographic questions (e.g., rank, gender, race/ethnicity, and geographic location) to identify unique individuals.
 - b) If the survey data is totally anonymous from the receipt of data, then it follows that:
 - (1) There are no issues with a requirement for a Systems of Record Notice. [DMDC Survey and Program Evaluation Division, however, does *not* make this determination.]
 - (2) The only dataset that is created is a nonconfidential dataset. For purposes of this discussion, we define such a dataset as one where there are no personal identifiers and where a dataset user should not reasonably be able to simultaneously cross answers to multiple demographic questions (e.g., rank, gender, race/ethnicity, and geographic

location) to identify unique individuals. The Privacy Act is the basic source for what cannot be contained in a nonconfidential dataset.

2. Are the survey data *not* totally anonymous from the receipt of data?
 - a) Personal identifiers and/or detailed demographics may be used by the data collector in the preparation and/or analysis of the data to prepare a report on the results *provided* that the dataset is part of a System of Records that has been announced in a Notice in the Federal Register.
 - b) Contractors can collect and possess personal identifiers and/or detailed demographics from a Federal survey only while performing and for the purpose of fulfilling a contractual obligation to the Federal Government. Contractors' possession of the information is by extension of the Federal agency's Systems of Records. After Government acceptance of the report(s) requiring the use of the data, the contractor should only keep a copy of the nonconfidential survey dataset. With the expiration of a contract, the contractor is no longer covered by the Systems notice and has no legal authority to have a copy of confidential survey datasets.
3. If the survey data are not totally anonymous from the receipt of data, is it clear whether the agency will possess/maintain a copy of the confidential dataset?
 - a) An agency *may* possess and maintain a copy of the confidential dataset only as long as this is covered by a Systems of Record Notice and is consistent with the Privacy Act disclosure on the survey. For example, if the Privacy Act Notice said that personal identifiers would only be used for data collection, then the agency (and any contractor involved) would have to remove personal identifiers and very detailed demographics upon completion of the data collection phase that can include nonresponse adjustments and weighting, but not analysis.
 - b) An agency need not possess at any time nor maintain a confidential dataset created for data collection and/or initial analysis. Keeping a copy of the confidential dataset is warranted as long as there is a reasonable expectation that the data has continuing utility and that the utility warrants the risk of disclosure.
4. Is it clear whether the agency will possess/maintain a copy of the nonconfidential dataset?
 - a) An agency should maintain a nonconfidential dataset even if they are maintaining a confidential dataset.
 - b) Only the nonconfidential dataset should be released to the public—even under almost all FOIA requests. [Note that individuals can obtain their own complete survey record.]
 - c) Typically, only the nonconfidential dataset should be released to contractors and other government offices, even other DoD offices.

5. If a contractor is gathering the data, is the contractor aware that all data except that in the nonconfidential database must be surrendered to the sponsoring agency at the completion of the contract or delivery order? That is, the contractor cannot keep a copy of the full database.
6. Does the survey package submitted to DMDC acknowledge that DoDI 1100.13 can require that DMDC receive a copy of the full database at the completion of the project for surveys of continuing interest to the Office of the Under Secretary of Defense (Personnel and Readiness)?

I. Privacy Act Statement

1. Does the survey's Privacy Act statement (PAS) adequately reflect the disclosure levels and risk described in the supporting statements for the survey? Is it in general conformity with typical statement used? [DMDC is not the official reviewer for PAS, but DMDC's reviews have alerted the Privacy Office with potential problems. See DoD Directive 5400.11 and 5400.11-R on the "DoD Privacy Program."]
2. If the submitter believes a PAS is not required, a letter from the sponsoring agency's Privacy Act officer should be attached. DoD Privacy Act Office will still examine the survey package to determine if they concur with ruling from the sponsoring agency.
3. DMDC does not check whether the appropriate authority is cited. The sponsoring agency's Information Management Control Officer should provide the authority. The authority will be checked by WHS/ESCD.

References

Management And Control Of Information Requirements, DoDD 8910.1 (1993). Available:
<http://www.dtic.mil/whs/directives/>

Surveys of DoD Personnel, DoDI 1100.13 (1996). Available:
<http://www.dtic.mil/whs/directives/>

m:\guides\dodi1100\chk_1st5.doc; 4-Apr-07